
IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:) Case No.: 19-09856
Al Palacz)
) Chapter 13
)
Debtor(s)) Judge: Timothy A. Barnes
)

NOTICE OF MOTION

TO: Al Palacz, 617 Cambridge Drive Schaumburg, IL 60193 *via mail*
Jennifer Irmel, Irmel Law Group, LLC, 77 W. Wacker Drive, Ste. 4500 Chicago, IL
60601 *via mail*
Trustee Marilyn Marshall, 224 S. Michigan Ave., #800, Chicago, IL 60604 *via ECF*
clerk's electronic delivery system
U.S. Trustee, 219 S. Dearborn Suite 873, Chicago, IL 60604 *via ECF clerk's electronic*
delivery system

PLEASE TAKE NOTICE that on **January 16, 2020 at 9:30 am**, I shall appear before the Honorable Judge Timothy A. Barnes at the Dirksen Federal Court, 219 S. Dearborn, Courtroom 744, Chicago, Illinois 60604 or any Judge presiding and then and there present the **Motion**, a copy of which is attached hereto.

By: /s/ David H. Cutler
David H. Cutler

CERTIFICATE OF SERVICE

I, David H. Cutler, hereby certify that I caused to be served, electronically or through U.S. Mail, a copy of the foregoing Notice and Motion upon the parties named above on December 23, 2019 before the hour of 5:00 p.m.

By: /s/ David H. Cutler
David H. Cutler, esq.
Counsel for Debtor(s)
Cutler & Associates, Ltd.
4131 Main St.
Skokie, IL 60076
Phone: (847) 673-8600

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MOTION TO APPROVE SETTLEMENT

NOW COMES the Debtor, Al Palacz, (hereafter referred to as “the Debtor”), by and through his attorneys, The Law Offices of Cutler & Associates, Ltd., to present this Motion and state as follows:

1. On April 4, 2019, the Debtor filed a petition for relief under Chapter 13 of the Bankruptcy Code.
2. This Honorable Court confirmed the Debtor’s Chapter 13 plan on July 11, 2019.
3. The Debtor has hired the law firm of Irmens Law Group, LLC, to pursue a claim due to personal injury.
4. The Debtor has received a settlement offer for his personal injury claim in the amount of \$50,000. Total settlement \$50,000 less \$17,114.02 to Debtor’s personal injury attorney, Jennifer Irmens, of Irmens Law Group, LLC, for attorney fees and litigation expenses and less \$10,554.54 to Blue Cross Blue Shield of Illinois for a medical lien, leaving \$22,331.44.
5. The Debtor respectfully requests that this Court allow him to accept the settlement of his personal injury claim.

WHEREFORE, Debtor prays that this Honorable Court enter an Order allowing the Debtor to accept the settlement of his personal injury claim and for such further relief that this Court may deem just and proper.

Dated: December 23, 2019

Respectfully Submitted,

/s/ David H. Cutler
David H. Cutler, esq.,
Counsel for Debtor(s):
Cutler & Associates, Ltd.
4131 Main St.
Skokie, IL 60076
Phone: (847) 673-8600